

The Law Office Of  
**STEVEN A. MORELLI**  
1461 Franklin Avenue, Garden City, New York 11530

Tel: 516-393-9151

Fax: 516-280-7528

---

September 26, 2011

Via ECF

Hon. Judge Eric N. Vitaliano  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Steve Ideyi v. Salvatore Sciafani (11-CV-3948) (ENV)(MDG)

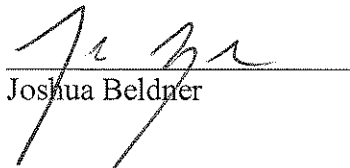
Dear Judge Vitaliano:

This firm represents Plaintiff Steve Ideyi in the above referenced matter, and we write in response to Defendant's letter, dated September 19, 2011, requesting a pre-motion conference.

Plaintiff recognizes that it may be necessary to amplify his claims by asserting additional factual allegations. Federal Rule 15(a) provides that an amendment as of right may be made at any time prior to the service of a responsive pleading. Cortec Indus., Inc. v. Sum Holding L.P., 949, F.2d 48 (2d Cir. 1991). Here, Defendant has not yet served a responsive pleading. As such, Plaintiff respectfully requests a short leave, so that he may file an Amended Complaint in this Action, and effect proper service upon Defendant.

Thank you for your time and consideration regarding this matter.

Very Truly Yours,

  
Joshua Beldner